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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Richard Klein, Raymond Urias and Sandra J.
Gunter, individually and on behalf of all others
similarly situated,

Plaintiffs,

-vs.-

National Collegiate Student Loan Trust 2005-
3, *et al.*,

Defendant.

CASE NO:2:22-cv-01392-GMN-BNW

CLASS ACTION

**STIPULATION AND PROPOSED
ORDER FOR EXTENDING TIME FOR
PLAINTIFFS TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

(FIRST REQUEST)

**Current Response Date: March 27, 2023
New Response Date: April 10, 2023**

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein, Raymond Urias and Sandra J. Gunter ("Plaintiffs") and Defendant, American Education Services, LLC ("AES" or "Defendant") (Plaintiff and Defendant collectively referred to as the "Parties"), by and through their respective counsel of record, hereby stipulate, agree and respectfully request that the Court extend the deadline for the Plaintiffs to file their response to Defendant's Motion to Dismiss (ECF No. 42) from March 27, 2023 to April 10, 2023.¹

¹ AES Motion to Dismiss was filed on March 13, 2023.

1 1. On December 23, 2022, Plaintiffs filed their First Amended Complaint. ECF NO.
2 20.

3 2. On December 29, 2022, Plaintiffs served the Summons and First Amended
4 Complaint on AES. ECF No. 24.

5 3. Therefore, AES' original response due date was January 19, 2023.

6 4. Defendant and the Plaintiffs agreed to an extension of time for Defendant to
7 respond to the First Amended Complaint through and until February 6, 2023. ECF No. 28.

8 5. Defendants then needed additional time to evaluate the information necessary to
9 appropriately respond to respond to the First Amended Complaint and the Parties agreed to
10 extension of time to respond to the First Amended Complaint through and until March 8, 2023.
11 ECF No. 28.

12 6. Counsel for AES fell ill and the Parties agreed that AES shall have up to and
13 including March 15, 2023 to file its responsive pleading to the Amended Complaint. ECF No.
14 43.

15 7. On March 13, 2023, filed its Motions to Dismiss Amended Complaint ("Motions
16 to Dismiss"). ECF NO. 42.

17 8. Plaintiffs' deadline to respond to these Motions to Dismiss set for March 27, 2023.

18 9. The Parties have discussed extending the deadline for Plaintiffs to respond to AES'
19 Motions to Dismiss in light of the multiple motions to dismiss that have been filed in this case
20 and the complexity of the matter.

21 WHEREAS, the parties hereby stipulate and agree to extend the deadline for Plaintiffs to
22 file their responsive pleading to AES' Motions to Dismiss (ECF Nos. 2) to April 10, 2023.

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IT IS SO STIPULATED.

Dated: March 21, 2023

FREEDOM LAW FIRM

/s/ George Haines

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*to motion for appearance *pro hac vice*
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Dated March 21, 2023

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ORDER**IT IS SO ORDERED.**Dated: March 21, 2023

 UNITED STATES DISTRICT JUDGE